

June 27, 2018

Via SCPSC E-FILING DMS

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

**Re: Application of Duke Energy Carolinas, LLC for Approval of Rider 10,
Demand-Side Management and Energy Efficiency for 2019
Docket No. 2018-72-E: Comments**

Dear Ms. Boyd:

Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), timely filed a Petition to Intervene in this case on March 19, 2018, which was granted by Public Service Commission ("Commission") Directive Order issued on April 4, 2018. By way of this letter, Walmart provides limited Comments (due on this date per the Commission's 2nd Revised Notice of Filing, issued June 8, 2018).

Walmart has reviewed Duke Energy Carolinas, LLC's ("DEC" or "Company") filing and supporting documentation, and has no objection to DEC's proposed changes. Walmart also notes that DEC proposes to maintain, without change, the opt-out provisions of Rider EE. Walmart strongly supports the opt-out concept in light of Walmart's extensive, self-funded energy efficiency ("EE")/demand-side management ("DSM") efforts; however, as Walmart explained in its Petition to Intervene in this matter, it believes that consideration should be given to modify DEC's "opt-out" procedures (Rider EE(SC), pages 1 and 2) so that they are consistent with the opt-out procedures embodied in the Duke Energy Progress ("DEP") tariff in South Carolina (Rider DSM/EE-8, Sheet 1 of 2), which Walmart believes are more efficient.

In that regard, Walmart previously raised this issue with DEC, but no changes have been forthcoming. Walmart affirms its willingness and desire to work cooperatively with DEC and the Office of Regulatory Staff ("ORS") to evaluate harmonizing the DEC and DEP opt-out processes as soon as practicable. Walmart therefore respectfully requests that the Commission urge DEC to engage with Walmart, ORS, and other interested parties in resolving this issue.

By copy of this letter, I am serving all parties of record via Electronic Mail and/or First-Class Mail. Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton
(SC Bar No. 80073)

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

Counsel to Wal-Mart Stores East, LP and Sam's East, Inc.

SUE/sds
Attachments
c: Certificate of Service

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-72-E

In the Matter of:

Application of Duke Energy Carolinas, LLC
for Approval of Rider 10, Demand-Side
Management and Energy Efficiency for 2019

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

Rebecca J. Dulin, Esquire
Duke Energy Corporation
1201 Main Street, Suite 1180
Capital Center Building
Columbia, SC 29201
rebecca.dulin@duke-energy.com

Heather Shirley Smith, Esquire
Duke Energy Carolinas, LLC
40 W. Broad Street, Suite 690
Greenville, SC 29601
heather.smith@duke-energy.com

Samuel J. Wellborn, Esquire
Robinson Gray Stepp & Laffitte, LLC
1310 Gadsden Street
Columbia, SC 29201
swellborn@sowellgray.com

Andrew M. Bateman, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
abateman@regstaff.sc.gov

Elizabeth Jones, Esquire
Southern Environmental Law Center
463 King Street, Suite B
Charleston, SC 29403
ejones@selcsc.org



Stephanie U. Eaton (SC Bar No. 80073)

Dated: June 27, 2018